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7  
8 **BEFORE THE**  
**BOARD OF REGISTERED NURSING**  
**DEPARTMENT OF CONSUMER AFFAIRS**  
9 **STATE OF CALIFORNIA**

10 In the Matter of the Accusation Against:

Case No. 2013-12

11 **LORRAINE GOLD, aka LORRAINE**  
12 **HELENE BATEMAN**  
13 **14916 Condon Avenue, Unit 1**  
**Lawndale, CA 90260**

**A C C U S A T I O N**

14 **Registered Nurse License No. 677297**

15 Respondent.

16  
17 Complainant alleges:

18 **PARTIES**

19 1. Louise R. Bailey, M.Ed., RN ("Complainant") brings this Accusation solely in her  
20 official capacity as the Interim Executive Officer of the Board of Registered Nursing, Department  
21 of Consumer Affairs.

22 2. On or about April 7, 2006, the Board of Registered Nursing issued Registered Nurse  
23 License Number 677297 to Lorraine Gold, aka Lorraine Helene Bateman ("Respondent"). The  
24 Registered Nurse License was in full force and effect at all times relevant to the charges brought  
25 herein and will expire on April 30, 2014, unless renewed.

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1 (a) Obtain or possess in violation of law, or prescribe, or except as directed  
2 by a licensed physician and surgeon, dentist, or podiatrist administer to himself or  
3 herself, or furnish or administer to another, any controlled substance as defined in  
4 Division 10 (commencing with Section 11000) of the Health and Safety Code or  
5 any dangerous drug or dangerous device as defined in Section 4022...”

6 10. Section 2764 of the Code provides, in pertinent part, that the expiration of a license  
7 shall not deprive the Board of jurisdiction to proceed with a disciplinary proceeding against the  
8 licensee or to render a decision imposing discipline on the license.

### 9 DRUG DEFINITIONS

10 11. **Hydrocodone** – a Schedule II controlled substance pursuant to Health and Safety  
11 Code section 11055, subdivision (b)(1)(I), and a dangerous drug pursuant to Business and  
12 Professions Code section 4022. Hydrocodone is in a class of medications called opiate (narcotic)  
13 analgesics and is used to relieve moderate to severe pain. Preparations containing hydrocodone in  
14 combination with other non-narcotic medicinal ingredients are in Schedule III.

### 15 COST RECOVERY

16 12. Section 125.3 of the Code provides, in pertinent part, that the Board may request the  
17 administrative law judge to direct a licentiate found to have committed a violation or violations of  
18 the licensing act to pay a sum not to exceed the reasonable costs of the investigation and  
19 enforcement of the case.

### 20 FIRST CAUSE FOR DISCIPLINE

#### 21 **(Unlawful Possession of a Controlled Substance)**

22 13. Respondent is subject to disciplinary action under Code section 2762, subdivision  
23 (a), in that Respondent possessed in violation of law, a controlled substance and dangerous drug,  
24 to wit hydrocodone. The conduct is more particularly described as follows:

25 14. On or about April 14, 2011, the City of Pismo Beach Police Department received a  
26 dispatch that Respondent was suicidal. A police officer found Respondent sitting in her vehicle  
27 with the driver's door ajar next to a large puddle of vomit. She had sent suicidal text messages to  
28 her husband, including stating that she wanted to kill herself, and for her husband not to “bother  
sending for medical 'cause it won't work, I will be gone by then.” On the front passenger seat,

1 she had a notepad containing four letters addressed to Respondent's husband and children and  
2 stating her good-byes. In addition, Respondent had in her possession Hydrocodone tablets, a  
3 bottle of insulin and insulin syringes.

4 **SECOND CAUSE FOR DISCIPLINE**

5 **(Unprofessional Conduct)**

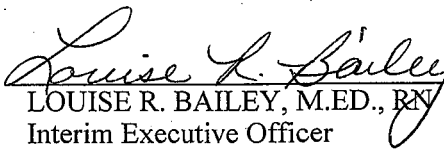
6 15. Respondent is subject to disciplinary action under Code section 2761, subdivision  
7 (a), in that Respondent engaged in unprofessional conduct. The conduct is more particularly  
8 described in paragraph 14; above, and is herein incorporated by reference.

9 **PRAYER**

10 WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged,  
11 and that following the hearing, the Board of Registered Nursing issue a decision:

- 12 1. Revoking or suspending Registered Nurse License Number 677297, issued to  
13 Lorraine Gold, aka Lorraine Helene Bateman;
- 14 2. Ordering Lorraine Gold, aka Lorraine Helene Bateman to pay the Board of  
15 Registered Nursing the reasonable costs of the investigation and enforcement of this case,  
16 pursuant to Business and Professions Code section 125.3;
- 17 3. Taking such other and further action as deemed necessary and proper.
- 18  
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20 DATED: July 3, 2012

  
LOUISE R. BAILEY, M.ED., RN  
Interim Executive Officer  
Board of Registered Nursing  
Department of Consumer Affairs  
State of California  
Complainant

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